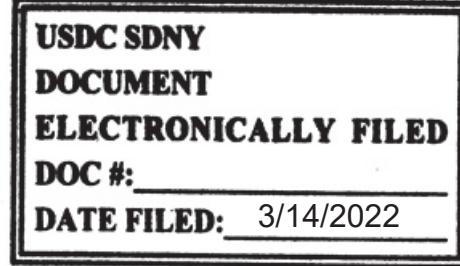




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Author's Direct:

March 11, 2022

Honorable Robert W. Lehrburger
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: Ricardo Alfredo Perez Flores v. Commissioner of Social Security
Civil Action No. 1:21-cv-08109-RWL

Dear Judge Lehrburger:

The undersigned with the consent of Defendant, respectfully requests a 60-day extension to file and serve Plaintiff's Motion for Summary Judgment on the Pleadings. Counsel respectfully request that Court grants this motion. This is Plaintiff's first extension request in this matter. Our office received approximately 10 Certified Administrative Records within a few days of each other. The resultant schedules include 8 motions due on the same date. Due to the unexpected influx of records and our limited capacity to handle such high volume in such a short time, we need additional time to file motions, including this one.

If granted, the following is the proposed Revised Scheduling Order:

- Plaintiff to serve written proposal on or by April 10, 2022.
- Parties to file Joint letter on or by May 10, 2022.
- Plaintiff to file and serve a Motion for Summary Judgement on or by July 9, 2022.
- Defendant to file and serve their Cross-Motion on September 7, 2022.
- Plaintiff to file and serve a Reply Brief, if any, on or by September 29, 2022.

We thank Your Honor for consideration in this matter.

Very truly yours,

PASTERNAK TILKER ZIEGLER
WALSH STANTON & ROMANO, LLP



Christopher D. Latham

CHRISTOPHER D. LATHAM

CDL sv

cc: Joseph Anthony Pantoja via ECF

The administrative record was filed on January 13, 2022. Plaintiff's motion was due March 13, 2022. Plaintiff's extension request is therefore effectively for 120 days, not 60 days. Accordingly, the Court extends the current deadlines as follows:

April 10, 2022: Plaintiff to serve written proposal.

May 10, 2022: Parties to file joint letter.

June 10, 2022: Plaintiff's motion.

Aug. 10, 2022: Defendant's cross-motion.

Aug. 31: Plaintiff's reply.

SO ORDERED:

3/14/2022


HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE